

# Exhibit B

**Re: Barbounis v. MEF--notice of intent**

Seth Carson <seth@dereksmithlaw.com>

Wed 10/14/2020 7:33 PM

**To:** Benson, Leigh Ann <LBenson@cozen.com>

**Cc:** Walton, David <DWalton@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>; Rhym, Kia B. <KRhym@cozen.com>; Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>

What are we doing about deps in the next 2 weeks? I need to depose:

1. Greg Roman,
2. Daniel Pipes,
3. Steve Levey,
4. Matthew Bennett,
5. Laurence Hollin,
6. Mark Fink

These depositions have to be scheduled on one of the following days:

October 15, 16, 19, 20, 21, 22, 23, 26, 27, 28.

If you want to schedule depositions for October 29 and 30 - I don't mind using those two days if you agree.

I am available every one of these days but October 16 and 20.

I am sorry but I have to request court intervention if we do not have dates and times certain for all deps in before Friday. There is no reason we cannot get on the phone and look at our calendars before Friday and set aside dates.

I am also willing to schedule depositions on nights or weekends too if necessary so we can get them all scheduled.

Please let me know by tomorrow afternoon that you agree and please suggest a time to discuss or confirm dates and times.

Greg Roman will require a day to himself but I will squeeze in Laurence Hollin or Steve Levey on the Greg Roman dep day. So I can do Greg Roman, Steve Levey and Laurence Hollin on one day.

I probably need 2 days for Daniel Pipes, Mark Fink, and Matthew Bennett but I can certainly try to get them all scheduled the same day if you would like.

Accordingly, I only need 2 days from your clients set aside for depositions as it stands now, but I am reserving the right to carry onto day 3 if necessary.

Therefore, you can use the remaining dates above and I will work with you to get anyone else scheduled you need to depose.

Again, I am going to ask Judge Wolson to order the above if we cannot agree to this in the last 2 weeks of discovery.

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**From:** Benson, Leigh Ann <LBenson@cozen.com>  
**Sent:** Wednesday, October 14, 2020 6:50 PM  
**To:** Seth Carson <seth@dereksmithlaw.com>  
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**Subject:** Barbounis v. MEF--notice of intent

Seth, please see the attached.



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